

# **Statement of Basis**

**Permit to Construct No. P-2016.0009  
Project ID 61680**

**Tri-Pro Forest Products, Inc.  
Oldtown, Idaho**

**Facility ID 017-00006**

**Draft for Facility Review**

**PROPOSED for Public Comment  
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Permit Writer**

The purpose of this Statement of Basis is to satisfy the requirements of IDAPA 58.01.01. et seq, Rules for the Control of Air Pollution in Idaho, for issuing air permits.

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## ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE

|                   |  |
|-------------------|--|
| acfm              | actual cubic feet per minute   |
| ASTM              | American Society for Testing and Materials   |
| Btu               | British thermal units  |
| cfm               | cubic feet per minute  |
| CO                | carbon monoxide  |
| CO <sub>2</sub>   | carbon dioxide   |
| CO <sub>2</sub> e | CO <sub>2</sub> equivalent emissions   |
| DEQ               | Department of Environmental Quality  |
| dscf              | dry standard cubic feet  |
| gr                | grains (1 lb = 7,000 grains)   |
| hr/yr             | hours per consecutive 12 calendar month period   |
| IDAPA             | a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act |
| lb/hr             | pounds per hour  |
| NO <sub>2</sub>   | nitrogen dioxide   |
| NO <sub>x</sub>   | nitrogen oxides  |
| NSR               | New Source Review  |
| PM                | particulate matter   |
| PM <sub>2.5</sub> | particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 micrometers                                      |
| PM <sub>10</sub>  | particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers                                       |
| PTC               | permit to construct  |
| PTE               | potential to emit  |
| <i>Rules</i>      | <i>Rules for the Control of Air Pollution in Idaho</i>   |
| scf               | standard cubic feet  |
| SIP               | State Implementation Plan  |
| SM                | synthetic minor  |
| SO <sub>2</sub>   | sulfur dioxide   |
| SO <sub>x</sub>   | sulfur oxides  |
| T/day             | tons per calendar day  |
| T/yr              | tons per consecutive 12 calendar month period  |
| T2                | Tier II operating permit   |
| TAP               | toxic air pollutants   |
| VOC               | volatile organic compounds   |

## FACILITY INFORMATION

### *Description*

Tri-Pro Forest Products, Inc. (Tri-Pro) is a dimensional lumber refurbishing facility that processes cedar primarily. The facility is located at 1122 Highway 2 at Oldtown, Idaho. Logs of various lumber species or used (resaw) cedar lumber is received at the facility and stored in the receiving yard. From the receiving yard, the logs or resaw are processed at the sawmill where they are cut into green dimensional lumber. Wood waste byproducts, such as bark, shavings, chips and sawdust, are collected and pneumatically transferred by cyclones to storage bins or directly into haul trucks for transportation off-site. Green lumber is dried in any of 10 electrically heated dehumidification dry kilns. Dried lumber is finished in the planer mill. Planer shavings and chips are pneumatically transferred to storage bins. Points of emissions are five cyclone exhausts and dry kiln roof-mounted vents. The cyclones are sources of PM<sub>10</sub> and PM<sub>2.5</sub> emissions. The kiln vents are sources of PM<sub>10</sub>, PM<sub>2.5</sub> and VOC emissions.

### *Permitting History*

This is the initial PTC for a facility previously regulated by a Tier II operating permit. The following information was derived from a review of the permit files available to DEQ. Permit status is noted as active and in effect (A) or superseded (S).

|                   |   |
|-------------------|---|
| DATE              | P-2016.0009, issued to Tri-Pro Cedar Products, Inc. Initial Facility-wide PTC – conversion of T2 to stand-alone PTC. Permit status (A)  |
| May 24, 2006      | Tier II Operating Permit No. T2-050126, issued to Tri-Pro Cedar Products, Inc. T2 renewal. This permit expired on May 24, 2011 but remains active. Permit status (A) but will become (S) upon issuance of this PTC.   |
| September 5, 2003 | Tier II Operating Permit No. T2-020114, issued to Tri-Pro Cedar Products, Inc. Facility-wide PM <sub>10</sub> NAAQS permit. Permit requires that Tri-Pro cease operating the Olivine wood waste incinerator. This permit expired on September 5, 2008. Permit status (S).   |
| December 17, 2001 | PTC No. P-017-00006, issued to Tri-Pro Cedar Products. PTC revision to establish the facility as a synthetic minor facility in order to opt out of the T1 program. PTC also required that Tri-Pro cease operating the seven (7) hogged fuel-fired boilers, and submit a facility-wide T2 application that demonstrated compliance with the PM <sub>10</sub> NAAQS. Permit status (S).   |
| April 25, 2000    | PTC No. P-990153, issued to TriPro Cedar Products. PTC is for a transfer of ownership. Permit status (S).   |
| January 24, 1990  | Operating Permit No. 0240-0006-002, issued to DAW Forest Products. Facility-wide operating permit issued for existing permitted sources (November 1980 permit) plus the new Olivine wood waste incinerator (see below). Permit expired on January 24, 1995. Permit status (S).  |
| January 24, 1990  | PTC No. 0240-0006, issued to DAW Forest Products. Initial PTC for the construction of a new Olivine wood waste incinerator and associated wood waste handling systems. Permit status (S).   |
| November 17, 1980 | Operating and Construction Permit No. 13-0240-0006, issued to Diamond International Corp., Northwest Lumber Division. Initial air quality permit issued to the facility. The permit established operating requirements to ensure compliance with ambient air quality standards. The permit regulated the following sources: one (1) chipper mill wigwam burner; seven (7) hogged fuel-fired boilers; and fugitive dust emissions. The permit expired on November 16, 1985. Permit status (S). |

## ***Application Scope***

This permit is the initial facility-wide PTC for this facility. The currently effect permit, Tier II (T2) Operating Permit No. T2-050126, expired on May 24, 2011. This permitting action converts the expired T2 permit to a stand-alone PTC.

## ***Application Chronology***

|   |  |
|---|--|
| March 22, 2016                              | DEQ received an application and an application fee.  |
| April 5 – April 20, 2016                    | DEQ provided an opportunity to request a public comment period on the application and proposed permitting action. A public comment period was requested by a member of the public. |
| April 21, 2016                              | DEQ determined that the application was complete.  |
| July 7, 2016                                | DEQ made available the draft permit and statement of basis for peer and regional office review.  |
| July 15, 2016                               | DEQ made available the draft permit and statement of basis for applicant review.   |
| <a href="#">Month Day – Month Day, Year</a> | DEQ provided a public comment period on the proposed action.   |
| <a href="#">Month Day, Year</a>             | DEQ received the permit processing fee.  |
| <a href="#">Month Day, Year</a>             | DEQ issued the final permit and statement of basis.  |

## **TECHNICAL ANALYSIS**

This permitting action is not commencement of construction of a new stationary source or a physical or operational change resulting in an increase of emissions or the emission of a pollutant not previously emitted. Because neither of these events are occurring, NSR is not triggered.

This permitting action is the conversion of an existing expired T2 operating permit to a stand-alone PTC. Air pollutant emissions from this facility do not increase as a result of this action, therefore, a revised EI was not developed and a technical analysis was not conducted.

## ***Ambient Air Quality Impact Analyses***

This permitting action does not increase the impact to ambient air quality because there is no increase of any regulated air pollutant. Consequently, an ambient air quality impact analysis is not required for this permitting action.

## **REGULATORY ANALYSIS**

### ***Attainment Designation (40 CFR 81.313)***

The facility is located in Bonner County, which is designated as attainment or unclassifiable for PM<sub>2.5</sub>, PM<sub>10</sub>, SO<sub>2</sub>, NO<sub>2</sub>, CO, and Ozone. Refer to 40 CFR 81.313 for additional information.

### ***Facility Classification***

The AIRS/AFS facility classification codes are as follows:

For THAPs (Total Hazardous Air Pollutants) Only:

- A = Use when any one HAP has actual or potential emissions  $\geq 10$  T/yr or if the aggregate of all HAPS (Total HAPs) has actual or potential emissions  $\geq 25$  T/yr.
- SM80 = Use if a synthetic minor (potential emissions fall below applicable major source thresholds if and only if the source complies with federally enforceable limitations) and the permit sets limits  $\geq 8$  T/yr of a

single HAP or  $\geq 20$  T/yr of THAP.

- SM = Use if a synthetic minor (potential emissions fall below applicable major source thresholds if and only if the source complies with federally enforceable limitations) and the potential HAP emissions are limited to  $< 8$  T/yr of a single HAP and/or  $< 20$  T/yr of THAP.
- B = Use when the potential to emit without permit restrictions is below the 10 and 25 T/yr major source threshold
- UNK = Class is unknown

For All Other Pollutants:

- A = Actual or potential emissions of a pollutant are  $\geq 100$  T/yr.
- SM80 = Use if a synthetic minor for the applicable pollutant (potential emissions fall below 100 T/yr if and only if the source complies with federally enforceable limitations) and potential emissions of the pollutant are  $\geq 80$  T/yr.
- SM = Use if a synthetic minor for the applicable pollutant (potential emissions fall below 100 T/yr if and only if the source complies with federally enforceable limitations) and potential emissions of the pollutant are  $< 80$  T/yr.
- B = Actual and potential emissions are  $< 100$  T/yr without permit restrictions.
- UNK = Class is unknown.

#### REGULATED AIR POLLUTANT FACILITY CLASSIFICATION

| Pollutant                           | Uncontrolled PTE (T/yr) | Permitted PTE (T/yr) | Major Source Thresholds (T/yr) | AIRS/AFS Classification |
|-------------------------------------|-------------------------|----------------------|--------------------------------|-------------------------|
| PM                                  | $<100$                  | $>100$               | <b>100</b>                     | SM                      |
| PM <sub>10</sub> /PM <sub>2.5</sub> | $<100$                  | 1.25 <sup>1</sup>    | <b>100</b>                     | SM                      |
| SO <sub>2</sub>                     | $>100$                  | $>100$               | <b>100</b>                     | B                       |
| NO <sub>x</sub>                     | $>100$                  | $>100$               | <b>100</b>                     | B                       |
| CO                                  | $>100$                  | $>100$               | <b>100</b>                     | B                       |
| VOC                                 | $<100$                  | 67.5                 | <b>100</b>                     | SM                      |
| HAP (single)                        | $>10$                   | $>10$                | <b>10</b>                      | B                       |
| HAP (Total)                         | $>25$                   | $>25$                | <b>25</b>                      | B                       |

<sup>1</sup>equivalent to the permit limit of 6.84 lb/day [6.84 lb/day x 365 day/yr x 1 T/2000 lb = 1.25 T/yr]

### **Permit to Construct (IDAPA 58.01.01.201)**

IDAPA 58.01.01.201 ..... Permit to Construct Required

The permittee has requested that a PTC be issued to the facility instead of renewing its expired T2 operating permit. DEQ has reviewed the records for this facility and nothing precludes the conversion of the T2 permit to a PTC. Therefore, a permit to construct will be issued in accordance with IDAPA 58.01.01.220. This permitting action was processed in accordance with the procedures of IDAPA 58.01.01.200-228.

### **Tier II Operating Permit (IDAPA 58.01.01.401)**

IDAPA 58.01.01.401 ..... Tier II Operating Permit

The application was submitted for a permit to construct (refer to the Permit to Construct section), and an optional Tier II operating permit has not been requested. Therefore, the procedures of IDAPA 58.01.01.400–410 were not applicable to this permitting action.

### **Visible Emissions (IDAPA 58.01.01.625)**

IDAPA 58.01.01.625 ..... Visible Emissions

The sources of PM emissions at this facility are subject to the State of Idaho visible emissions standard of 20% opacity. This requirement is assured by Permit Conditions 2.7 and 2.8.

## ***Title V Classification (IDAPA 58.01.01.300, 40 CFR Part 70)***

IDAPA 58.01.01.301 ..... Requirement to Obtain Tier I Operating Permit

This facility is not a Major Facility as defined by IDAPA 58.01.01.008.10, therefore, the facility is not subject to the requirements of IDAPA 58.01.01.301-399.

## ***PSD Classification (40 CFR 52.21)***

40 CFR 52.21 ..... Prevention of Significant Deterioration of Air Quality

The facility is not a major stationary source as defined in 40 CFR 52.21(b)(1), nor is it undergoing any physical change at a stationary source not otherwise qualifying under paragraph 40 CFR 52.21(b)(1) as a major stationary source, that would constitute a major stationary source by itself as defined in 40 CFR 52. Therefore in accordance with 40 CFR 52.21(a)(2), PSD requirements are not applicable to this permitting action. The facility is/is not a designated facility as defined in 40 CFR 52.21(b)(1)(i)(a), and does not have facility-wide emissions of any criteria pollutant that exceed 250 T/yr.

## ***NSPS Applicability (40 CFR 60)***

The facility is not subject to any NSPS requirements 40 CFR Part 60.

## ***NESHAP Applicability (40 CFR 61)***

The facility is not subject to any NESHAP requirements in 40 CFR 61.

## ***MACT Applicability (40 CFR 63)***

The facility is not subject to any MACT standards in 40 CFR Part 63.

## ***Permit Conditions Review***

This section describes the permit conditions for this initial permit or only those permit conditions that have been added, revised, modified or deleted as a result of this permitting action. All permit conditions from the expired T2 permit have been incorporated into this PTC with the exception of Permit Condition 2.18 which is explained below.

Existing Permit Condition 2.18, *Cease Operations of Hogged Fuel Fired Boilers and Olivine Woodwaste Incinerator and Close #6 Trimmer Cyclone Exhaust*

According to an April 24, 2009, inspection report conducted by the DEQ Coeur d'Alene Regional Office, the hogged fuel fired boilers and the Olivine wood waste incinerator have been rendered inoperable and no longer reside within the confines of the facility. For this reason, existing Permit Condition 2.18 has been deleted from the permit.

## **PUBLIC REVIEW**

### ***Public Comment Opportunity***

An opportunity for public comment period on the application was provided in accordance with IDAPA 58.01.01.209.01.c. During this time, there were no comments on the application and there was a request for a public comment period on DEQ's proposed action. Refer to the chronology for public comment opportunity dates.

### ***Public Comment Period***

A public comment period was made available to the public in accordance with IDAPA 58.01.01.209.01.c. During this time, comments [were/were not](#) submitted in response to DEQ's proposed action. Refer to the chronology for public comment period dates.

***{comments received}*** A response to public comments document has been crafted by DEQ based on comments submitted during the public comment period. That document is part of the final permit package for this permitting action.

## **APPENDIX A – FACILITY DRAFT COMMENTS**

**The following comments were received from the facility on **Month Date, Year:****

**Facility Comment:** XXX.

**DEQ Response:** XXX.

## **APPENDIX B – PROCESSING FEE**